

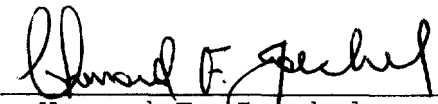
Furthermore, we urge the Commission generally to recognize that similarly situated stations may request the use of alternative labor force data based on a proper showing.

#### CONCLUSION

The objective of this Commission's EEO enforcement efforts should be equal opportunity, not regulation for its own sake. To the extent that the Commission inflexibly applies record-keeping and other procedural requirements to licensees with demonstrably good employment and hiring records, it risks losing sight of that paramount goal. In these comments, we have attempted to suggest several ways in which the Commission's oversight in this area could be made fairer and less regulatory, without compromising its effectiveness. We respectfully request that these proposals be given serious consideration.

Respectfully submitted,

CBS Inc.

By   
Howard F. Jaeckel

Its Attorney

51 West 52 Street  
New York, New York 10019  
July 11, 1996

June 15, 1994

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Dear Mr. Caton:

**Re:   Joint Request Of Miami-Fort Lauderdale  
      Television Stations To Use Broward-Dade  
      County Labor Force Data For EEO Purposes**

CBS Inc., Channel 39 Licensee Inc., Combined Broadcasting of Miami, Inc., NBC Subsidiary (WTVJ) Inc., Post-Newsweek Stations of Florida, Inc. and Sunbeam Television Corp., own and operate television stations WCIX (Ch. 6, CBS), WDZL (Ch. 39, Independent), WBFS (Ch. 33, Independent), WTVJ (Ch. 4, NBC), WPLG (Ch. 10, ABC) and WSVN (Ch. 7, FOX), respectively ("Licensees"), in the Miami (Dade County)-Fort Lauderdale (Broward County) television market. Licensees jointly request that the FCC authorize them to use labor force data for the Broward-Dade bi-county area, rather than rely on data for Dade County alone, in connection with the mid-term and license renewal reviews of the stations' EEO performance.

As shown below, the Commission's standard assumption that the metropolitan statistical area ("MSA") defines television stations' actual labor pool or recruitment area, while appropriate for many television markets in the country, significantly distorts the reality of television stations in the Miami-Fort Lauderdale market. This distortion occurs because the MSA used to define Licensees' labor pool for EEO purposes is limited to Dade County, when in fact approximately 40% of Licensees' potential employees and viewers live in adjoining Broward County. Thus, although Licensees recruit and employ individuals from the core, bi-county area they serve (both large, ethnically diverse counties), the Commission cabins its vision to an artificially small piece of this area. Single-county MSAs are extremely unusual in larger markets and in no other such case does the MSA so severely underestimate the actual labor pool as it does in the Miami-Fort Lauderdale market. Thus, by relying on MSA labor force data alone, the Commission inadvertently treats Licensees differently from stations in other television markets. Licensees respectfully urge the Commission to remedy their anomalous situation by authorizing them to use labor force data for Broward and Dade counties that reflect the real-world labor market in which the stations operate.<sup>1/</sup>

---

<sup>1/</sup>     The Commission recently underscored its receptivity to applying EEO rules, policies and standards in ways to "better enable broadcasters to meet their EEO

(continued...)

Mr. William F. Caton  
June 15, 1994  
Page 2

### **FCC's Standard Approach To Labor Force Data**

The FCC's EEO review process seeks to ensure that stations' minority and female employment levels are "within a zone of reasonableness," Bilingual Bicultural Coalition of Mass Media, Inc. v. FCC, 492 F.2d 656, 658 (D.C. Cir. 1974),<sup>2/</sup> and that their EEO efforts produce "reasonable representation" of protected groups at stations corresponding to their presence in the available labor force.<sup>3/</sup> To carry out this goal, the FCC ordinarily uses the MSA in which a station's city of license is located to define its available labor force pool.<sup>4/</sup> Because MSAs often represent broad metropolitan areas (normally more than one county) that encompass television stations' core service and recruitment areas, MSA labor data serve as reasonably good indicators of the actual recruitment areas of stations in the vast majority of television markets. The FCC has properly recognized that use of MSA data may not reasonably represent the labor force available to a station in some circumstances. So that its evaluation of EEO performance remains "reasonable," the FCC permits stations to submit alternative labor force data if the "MSA or county data would not accurately reflect the available labor force."<sup>5/</sup>

---

<sup>1/</sup>(...continued)

obligations," thereby making more effective its basic equal employment opportunity goals. Notice of Inquiry, FCC 94-103 (released April 21, 1994). As outlined in the Joint Request, an unduly rigid application of the Commission's MSA benchmark places an unfair burden on Licensees. By relying on bi-county data for Miami-Fort Lauderdale television stations, the Commission can evaluate Licensees' EEO efforts in light of real-life circumstances and according to the standard of "reasonableness" applied to television stations in other markets.

<sup>2/</sup> See also, Stone v. FCC, 466 F.2d 316, 332 (D.C. Cir. 1972).

<sup>3/</sup> Nondiscrimination in the Employment Policies and Practices of Broadcast Licensees, 60 FCC 2d 226, 242 (1976). Consideration of the zone of reasonableness plays a significant role in the Commission's efforts-based renewal analysis and mid-term review, as well as under the new guidelines of the 1994 Standards for Assessing Forfeiture for Violation of the Broadcasting EEO Rules, FCC 94-27 (released February 1, 1994).

<sup>4/</sup> Equal Employment Opportunity in the Broadcast Radio and Television Services, 2 FCC Rcd 3967, 3974 (1987). For stations licensed to communities outside a MSA, the FCC uses labor force data for the county in which they are located. Id.

<sup>5/</sup> Id. at 3973. Accord, e.g., National Capital Christian Broadcasting, Inc., 3 FCC Rcd 1919, 1920 (1988)(noting that the FCC relies on MSA data "unless the station provides a reasoned explanation for use of alternative data").

Mr. William F. Caton  
June 15, 1994  
Page 3

To date, the Commission has only evaluated proposals for use of alternative data under a test in which a station must establish that it is unable to attract protected group employees from the entire MSA because: "1) the distance of the station from areas with significant minority population in the MSA is great; 2) commuting from those areas to the station is difficult...; or 3) recruitment efforts directed at the MSA minority labor force have been fruitless."<sup>6/</sup> This approach may be appropriate where a station draws its employees from a labor pool smaller than is contained in an entire MSA. Licensees' stations are confronted by a different, more unusual situation -- their stations draw from a labor pool much larger than is contained in the single-county (Dade) MSA.<sup>7/</sup> For its review of Licensees' stations to be reasonable, the Commission, as outlined below, must depart from the traditional alternative labor force test in this unusual situation to capture the much larger portion of the labor pool actually available to (and well-represented in) Licensees' stations.

#### **Miami-Fort Lauderdale Market**

Miami is located in the central eastern part of Dade County which itself lies at the southeastern tip of a metropolitan area stretching along Florida's Atlantic Coast from Miami north to Fort Lauderdale in Broward County. Monroe County, the home of the Everglades and with a small population, lies south of Miami at the tip of the Florida Peninsula. The Arbitron Company and A. C. Nielsen Co. classify the Miami (Dade

---

<sup>6/</sup> Id. In practice, few stations have satisfied this test. E.g., National Capital Christian Broadcasting, Inc., 3 FCC Rcd 1919 (1988). Accord, Gulf Atlantic Media Corp., 8 FCC Rcd 603 (1993); Certain California Television Stations, 6 FCC Rcd 2340, 2344 n. 10 (1991).

<sup>7/</sup> The alternative labor force test is ill suited, and was not fashioned, to deal with the unusual situation in which the MSA excludes a major portion of a station's actual labor pool. For example, the test focuses on areas within the MSA to determine whether station facilities are distant from areas of significant minority concentration, whether commuting is difficult from such areas and whether, as a result, recruitment efforts have proved fruitless within the MSA so that reference to a smaller area is warranted. Here, the proffered facts show that reference to a larger area is warranted because the single-county MSA excludes approximately 40% of the stations' available labor pool. It is because Licensees' facilities serve and are reasonably accessible to residents of the bi-county area, including communities with significant minority concentrations in both Broward and Dade counties, that here reliance on alternative labor force data is appropriate.

Mr. William F. Caton  
June 15, 1994  
Page 4

County)-Fort Lauderdale (Broward County) area as a single television market.<sup>8/</sup> The Miami-Fort Lauderdale area is considered a combined metropolitan area for many other purposes as well. The Office of Management and Budget, using 1990 U.S. Census data, classifies the bi-county area as the Miami-Fort Lauderdale Consolidated Metropolitan Statistical Area ("CMSA").<sup>9/</sup> Broward, Dade and Monroe counties also comprise the Miami-Fort Lauderdale Basic Trading Area, a standard Rand McNally commercial classification.<sup>10/</sup> In addition, the Commission itself considers Broward and Dade counties as a single metropolitan area in licensing such new services as cellular, narrowband and broadband PCS and interactive video data services.<sup>11/</sup>

The Miami-Fort Lauderdale Arbitron market (the 15th ranked ADI) consists of 1,308,200 TV households, fairly evenly distributed with 54.1% in Dade County and 43.3% in Broward County.<sup>12/</sup> The available labor force within the bi-county CMSA approximates viewer distribution, with 60.6% of the total civilian labor force in Dade County and 39.3% in Broward County.<sup>13/</sup> Each day Licensees' stations

---

<sup>8/</sup> See Broadcasting & Cable Yearbook 1994, Vol. 1, at C-167.

<sup>9/</sup> See U.S. Bureau of the Census, Metropolitan Areas (MSA's, CMSA's and PMSA's) as Designated by OMB, revised June 1993.

<sup>10/</sup> See Rand McNally Commercial Atlas & Marketing Guide, at 38-39 (125th Ed. 1994).

<sup>11/</sup> See Common Carrier Public Mobile Services Information, Cellular MSA/RSA Markets and Counties (Jan. 24, 1992), Report No. 92-40, at 2 (identifying cellular license service area as Miami-Fort Lauderdale-Hollywood, FL); New Narrowband Personal Communications Services, 9 FCC Rcd 1309 (1994) (identifying the BTA service area as Miami-Fort Lauderdale); New Broadband Personal Communications Services, 8 FCC Rcd 7700 (identifying BTAs and MTAs as service areas); Private Radio Bureau Information, Notice and Filing Requirements for the First Auction of Interactive Video Data Service Licenses (May 23, 1994), Report No. ABC-94-02, Auction No. 2, at A1 (identifying IVDS service area as Miami-Fort Lauderdale-Hollywood, FL).

<sup>12/</sup> See Broadcasting & Cable Yearbook 1994, Vol. 1, at C-169. The remaining 2.6% of the TV households are in Monroe County. All but one of the Licensees broadcast from a transmitter on the Dade County-Broward County border, nearly equidistant from Miami and Fort Lauderdale. WCIX(TV)'s transmitter site is centered south of Miami. See Attachment C.

<sup>13/</sup> See 1990 Census of Population, Social and Economic Characteristics (Florida, Section 1 of 3), 1990 CP-2-11, at 302-03.

Mr. William F. Caton  
June 15, 1994  
Page 5

make periodic on-air announcements identifying their service to the Miami-Fort Lauderdale bi-county area.<sup>14/</sup> Their area of recruitment is no smaller than their core area of service, and Licensees actively recruit from a variety of organizations and groups in Broward County, including a number of minority sources (e.g., WSVN(TV) regularly recruits through 12 such minority sources).

An examination of the existing staff of Licensees' stations shows that Broward County is a major part of their actual labor pool and recruitment area. Of full-time employees, from 26% to 74% reside in Broward County. Licensees as a group employ 799 full-time employees, of whom 35% (277) reside in Broward County. Moreover, because both Broward and Dade counties are diverse, a significant number of Licensees' minority employees, from 13% to 82%, reside in Broward County. Licensees as a group employ 310 full-time minority employees, of whom 23% (70) reside in Broward County.<sup>15/</sup> Of each Licensee's full-time Hispanic staff, 14% to 85% of the employees reside in Broward County. As a group, Licensees employ 201 full-time Hispanic employees, of whom 21% (43) reside in Broward County.<sup>16/</sup> See Attachment A.

Licensees' stations naturally draw from the Broward labor pool because their facilities are reasonably accessible to both Broward and Dade counties' population centers, including those with significant concentrations of members of protected

---

<sup>14/</sup> Fort Lauderdale-Broward County residents naturally depend on service from Licensees' stations because only Channel 51 and Channel 69 are allocated to Fort Lauderdale and Hollywood, respectively. See Section 73.606 of the rules.

<sup>15/</sup> The percentage of full-time minority employees in Licensees' combined staff (23%) is comparable with the presence of minorities in the Broward County labor force (25.8%) and, as noted below, the percentage of Hispanic employees in the stations' work force (21%) significantly exceeds the presence of Hispanics in the Broward County labor force (9.3%). See Attachments A and B.

<sup>16/</sup> Broward County residents also constitute a major source of the stations' applicants and interviewees. For example, WSVN(TV) received 1,597 applications for full-time/part-time positions between May 1, 1992 and May 1, 1994. A total of 26% of the applicants resided in Broward County and 18% of minority applicants resided in that county. Of WTVJ(TV)'s 263 interviewees for full-time positions during this same period, 28% resided in Broward County and 17% of minority interviewees resided in that county.

Mr. William F. Caton  
June 15, 1994  
Page 6

groups.<sup>17/</sup> WDZL(TV) has its main studio in Broward County, and the other five Licensees have main studios in the northeastern part of Dade County. Four of these stations also have a Broward County News Bureau, and WBFS(TV)'s main studio is less than a mile from the Broward County line.

### **Departure From MSA Benchmark Is Warranted**

While Broward and Dade counties are both large, diverse areas, Dade County statistics alone do not accurately reflect the available labor pool of Licensees' television stations. As reflected in Attachment B, the percentage of females in the labor force is the same in both counties, and the percentage of Blacks in the labor force of each county is comparable (e.g., 14.8% in Broward County and 18.6% in Dade County). However, the overall minority labor force in Dade County is 71.5%, compared with 25.8% in Broward County; and Hispanics constitute 51.4% of the Dade County labor force and 9.3% of the Broward County labor force. As shown, Broward County constitutes an integral portion of Licensees' core service area, and Licensees draw their employees from the larger bi-county area. Thus, the composition of Licensees' work force should reasonably be judged by Broward-Dade County labor force data, rather than data that omits approximately 40% of the actual labor pool.<sup>18/</sup>

By relying on Dade County data alone, and ignoring Broward County, the Commission unintentionally treats Licensees' stations differently from stations in other television markets. To illustrate, in each of the ten next smaller and ten next larger markets, only the San Diego ADI (the 24th ranked market) has a single-county MSA (San Diego County). There, however, in sharp contrast to Licensees' situation, the San Diego television ADI consists of San Diego County alone. Thus, the single-county MSA in that instance does not exclude a major portion of the core service area and the actual labor pool.<sup>19/</sup> By using alternative labor force data for Broward and Dade counties, the

---

<sup>17/</sup> Nearly all of Licensees' employees drive to work, since public transportation is not convenient to the stations from either county.

<sup>18/</sup> Each Licensee conscientiously implements an active affirmative action program designed to attract members of protected groups to their ranks -- a commitment illustrated by the composition of their current staffs. See Attachment A.

<sup>19/</sup> In markets ranked 26 through 50, only West Palm Beach-Fort Pierce-Vero Beach ADI (ranked 46) has a single-county MSA. There, too, unlike Licensees' Miami-Fort Lauderdale circumstances, the bulk of the core coverage population lies within the single-county (Palm Beach) MSA. Among the much larger top five markets, only Los Angeles  
(continued...)

Mr. William F. Caton  
June 15, 1994  
Page 7


Commission would place Licensees' stations on a more equal footing with stations in other television markets for which the MSA benchmark appears reasonable.

### **Conclusion**

The Commission should use Broward-Dade bi-county labor force data as the initial frame of reference in judging whether protected groups in Licensees' work force reasonably mirror their presence in the available labor pool. By so doing, the FCC will ensure that Licensees' Miami-Fort Lauderdale stations are treated fairly and evaluated reasonably according to real-life circumstances reflecting the population of their core service area and labor pool. Licensees strongly support the goal of encouraging equal employment opportunity and pledge their continuing efforts toward ensuring reasonable representation of protected groups in the stations' work forces.

Respectfully submitted,

CBS INC.

By:   
Howard F. Jaeckel  
Mark W. Johnson

CBS INC.  
1634 Eye Street, N.W.  
Washington, D.C. 20006  
(202) 457-4513

---

<sup>19/</sup>(...continued)

(ranked second) has a single-county MSA. Los Angeles County, of course, is a large, highly-populated area and several of the much smaller ADI counties are distant from it.



Mr. William F. Caton  
June 15, 1994  
Page 8

CHANNEL 39 LICENSEE INC.

By: Peter D. O'Connell  
Peter D. O'Connell

REED, SMITH, SHAW & MCCLAY  
1200 Eighteenth Street, N.W.  
Washington, D.C. 20036  
(202) 457-8647

COMBINED BROADCASTING OF MIAMI, INC.

By: David D. Oxenford, Jr.  
David D. Oxenford, Jr.

FISHER WAYLAND COOPER LEADER &  
ZARAGOZA LLP  
2001 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006-1851  
(202) 775-3546

NBC SUBSIDIARY (WTVJ) INC.

By: John K. Hane III  
John K. Hane III

NATIONAL BROADCASTING COMPANY, INC.  
1299 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004  
(202) 637-4535

Mr. William F. Caton  
June 15, 1994  
Page 9

POST-NEWSWEEK STATIONS OF FLORIDA, INC.

By: Robert E. Branson  
Robert E. Branson

POST-NEWSWEEK STATIONS, INC.  
1150 Fifteenth Street, N.W.  
Washington, D.C. 20071  
(202) 334-4615

By: William H. Fitz  
Jonathan D. Blake  
William H. Fitz  
Ellen P. Goodman

COVINGTON & BURLING  
1201 Pennsylvania Avenue, N.W.  
P.O. Box 7566  
Washington, D.C. 20044-7566  
(202) 662-6000

SUNBEAM TELEVISION CORP.

By: Arthur B. Goodkind  
Arthur B. Goodkind

KOTEEN & NAFTALIN  
1150 Connecticut Avenue, N.W.  
Washington, D.C. 20036  
(202) 467-5700

**EMPLOYEE PROFILE OF LICENSEES**

(Full-Time Employees)

	<u>Total</u>	<u>Reside In Broward County</u>	<u>Reside In Dade County</u>
<b>WDZL (Ch. 39) (I)</b>			
Employees	53	39 (73.6%)	11 (20.8%)
Minority Employees	17	14 (82.4%)	3 (17.6%)
Hispanic Employees	13	11 (84.6%)	2 (15.4%)
<b>WBFS (Ch. 33) (I)</b>			
Employees	54	23 (42.6%)	30 (55.6%)
Minority Employees	26	5 (19.2%)	21 (80.8%)
Hispanic Employees	12	2 (16.7%)	10 (83.3%)
<b>WSVN (Ch. 7) (FOX)</b>			
Employees	191	66 (34.5%)	124 (65%)
Minority Employees	79	17 (21.5%)	61 (77.2%)
Hispanic Employees	49	11 (22.5%)	38 (77.6%)
<b>WPLG (Ch. 10) (ABC)</b>			
Employees	175	56 (32%)	119 (68%)
Minority Employees	64	13 (20.3%)	51 (79.7%)
Hispanic Employees	44	7 (16%)	37 (84%)

	<u>Total</u>	<u>Reside In Broward County</u>	<u>Reside In Dade County</u>
<b>WTVJ (Ch. 4) (NBC)</b>			
Employees	186	57 (31%)	123 (66%)
Minority Employees	62	13 (21%)	46 (74%)
Hispanic Employees	40	6 (15%)	33 (82%)
<b>WCIX (Ch. 6) (CBS)</b>			
Employees	140	36 (25.7%)	104 (74.3%)
Minority Employees	62	8 (13%)	54 (87.1%)
Hispanic Employees	43	6 (14%)	37 (86%)

## ATTACHMENT B

**1990 U.S. CENSUS DATA**  
 (Civilian Labor Force)

	<u>Broward/Dade</u>	<u>Dade</u>	<u>Broward</u>
Total Employees	1,609,780	976,754	633,026
Total Females	744,028	452,711	291,317
% Females	46.2%	46.3%	46.0%
Total Minorities	862,238	698,820	163,418
% Minorities	53.6%	71.5%	25.8%
Total Black	275,046	181,256	93,790
% Black	17.1%	18.6%	14.8%
Total Hispanic	560,963	502,336	58,627
% Hispanic	34.8%	51.4%	9.3%

Source: 1990 Census of Population, Social and Economic Characteristics (Florida, Section 1 of 3), 1990 CP-2-11, at 302-03, 428, 431.

## ATTACHMENT C

## Florida—Miami-Fort Lauderdale

**WTVJ**

Ch. 4

**Network Service:** NBC.

**Licensee:** NBC Subsidiary, 316 N. Miami Ave., Miami, FL 33128.

**Studio:** 316 N. Miami Ave., Miami, FL 33128.

**Telephone:** 305-379-4444. **TWX:** 810-848-5932. **Fax:** 305-789-4181.

**Technical Facilities:** Channel No. 4 (66-72 MHz). Authorized power: 100-kw visual, 10-kw aural. Antenna: Circularly polarized, 1041-ft. above av. terrain, 1041-ft. above ground, 1049-ft. above sea level.

Latitude 25° 58' 07"  
Longitude 80° 13' 20"

**Transmitter:** 1255 N.W. 210th St., Miami, FL.

**Satellite Earth Stations:** Vertex, 11-meter Ku-band; Hero, 8-meter; Hero, 7.5-meter C-band; Scientific-Atlanta, 7-meter C-band; Vertex, 6.1-meter Ku-band; Scientific-Atlanta receivers.

**News Services:** AP, CNN, NBC, Nexus, NIWS, Reuters, Sports News Satellite, UPI.

**Ownership:** National Broadcasting Co. (Group Owner).

**Began Operation:** March 21, 1949. Sale to KKR Assoc. by Wometco Enterprises Inc. approved by FCC April 11, 1984 (*Television Digest*, Vol. 23:39, 52). Sale to present owner by KKR approved by FCC Sept. 17, 1987 (Vol. 26:43; 27:3, 11, 14, 18, 22, 37, 38).

**Represented (sales):** Petry Television Inc.

### Personnel:

**Don Browne**, President & General Manager.

**Barry Allentuck**, Director of Sales.

**Paul Russell**, Director of Engineering.

**Sharon Scott**, News Director.

**Maritza Kaniewski**, Program Administrator.

**Jana Miller**, Promotion Director.

**Alan Thiel**, Business Manager.

**Carol Devane**, Marketing Director.

**Bruce Carter**, Production Manager.

**Debbie Brooks**, Traffic Operations Manager.

**Marina Angleton**, Public Affairs Director.

**Highest 30 Sec. Rate:** \$6000.

**NETWORK BASE HOURLY RATE:** \$2027.

**City of License:** Miami. **ADI:** Miami-Fort Lauderdale. **Rank:** 15.

Total Households: ©MSI Consumer Market Data as of 1/1/93. TV Homes, TV% and Circulation ©1993 Arbitron. County coverage based on Arbitron study.



WTVJ BPCT-920225KE Granted 9/30/92

© American Map Corp., No. 14244

Net Weekly Circulation	State County	Total Households	TV Households	%
50% & Over	FLORIDA			
	Broward	553,600	550,900	100
	Dade	713,800	708,900	99
	Monroe	35,100	34,400	98
Between 25-49%	FLORIDA			
	Palm Beach So	152,300	150,700	99
Between 5-24%	FLORIDA			
	Palm Beach No	247,400	245,100	99
<b>Station Totals</b>		<b>1,702,200</b>	<b>1,690,000</b>	<b>99</b>
<b>Net Weekly Circulation (1993)</b>				<b>1,059,600</b>
<b>Average Daily Circulation (1993)</b>				<b>563,000</b>

## Florida—Miami-Fort Lauderdale

**WSVN**

Ch. 7

**Network Service:** Fox.

**Licensee:** Sunbeam Television Corp., Box 1118, Miami, FL 33138.

**Studio:** 1401 79th St. Causeway, Miami, FL 33141.

**Telephone:** 305-751-6692. **TWX:** 810-848-6151. **Fax:** 305-757-2266.

**Technical Facilities:** Channel No. 7 (174-180 MHz). Authorized power: 316-kw visual, 31.6-kw aural. Antenna: 960-ft. above av. terrain, 996-ft. above ground, 1002-ft. above sea level.

Latitude 25° 57' 49"  
Longitude 80° 12' 44"

**Transmitter:** Antenna Farm, North Dade County, FL.

**Multichannel TV Sound:** Stereo only.

**Satellite Earth Stations:** Transmit/receive Scientific-Atlanta, 10-meter C-band; Andrew, 7.3-meter Ku & C-band; Microdyne, 5-meter Ku & C-band; Microdyne, 3.6-meter Ku & C-band; Microdyne, Scientific-Atlanta, Standard Communications receivers.

**SNG Mobile Dish:** Andrew, 3.2-meter Ku-band.

**News Services:** AP, UPI, CNN.

**Ownership:** Sunbeam Television Corp. (Group Owner).

**Began Operation:** July 29, 1956. On Dec. 5, 1962 the FCC ordered that Biscayne Television Corp. cease operation of WCKT no later than Jan. 4, 1963 and the FCC also approved sale of WCKT plant and firm licensing agreements to Sunbeam Television Corp., which was licensed as a new station. Present ownership assumed operation Dec. 19, 1962.

**Represented (sales):** Harrington, Righter & Parsons Inc.

**Represented (legal):** Koteen & Naftalin; Mintz, Levin, Cohn, Ferris, Glovsky & Popeo.

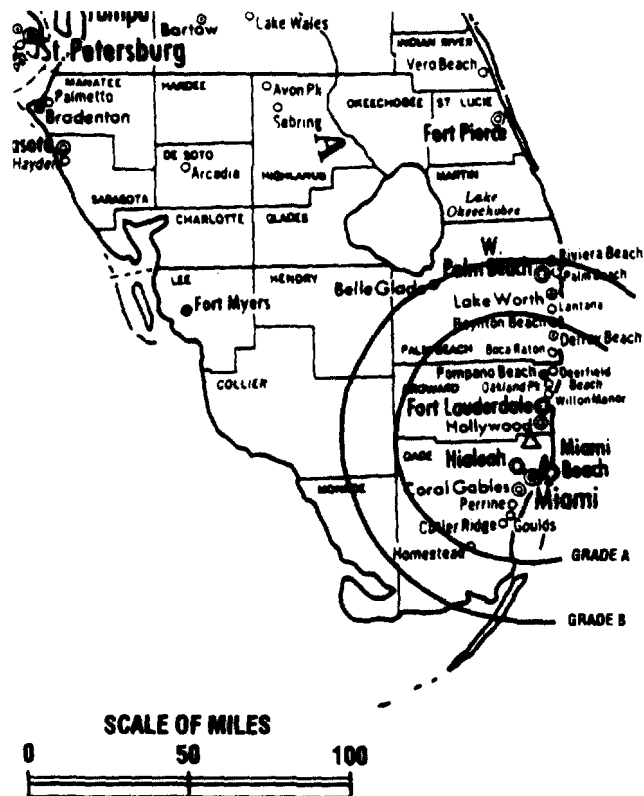
### Personnel:

Edmund H. Ansin, President.  
Robert W. Leider, Executive Vice President & General Manager.  
Joel Cheeswood, Senior Vice President, News.  
Michael Droman, General Sales Manager.  
Daniel Mellon, National Sales Manager.  
Bert Medina, Programming & Operations Manager.  
Brian Greif, News Director.  
John Bak, Chief Engineer.  
Beatriz Montalvo, Director of Creative Services.  
Dianna Stever, Business Manager.  
Betty Frazier, Marketing Research.  
Charlie Felds, Director of Community & Public Relations.

**Rates:** On request.

**City of License:** Miami. **ADI:** Miami-Fort Lauderdale. **Rank:** 15.

**Total Households:** ©MSI Consumer Market Data as of 1/1/93. TV Homes, TV's and Circulation ©1993 Arbitron. County coverage based on Arbitron study.



WSVN BPCT-4719 Granted 9/14/74

© American Map Corp., No. 14244

Net Weekly Circulation	State County	Total Households	TV Households	%
<b>50% &amp; Over</b>	<b>FLORIDA</b>			
	Broward	553,600	550,900	100
	Dade	713,800	708,900	99
	Monroe	35,100	34,400	98
<b>Between 25-49%</b>	<b>FLORIDA</b>			
	Palm Beach So	152,300	150,700	99
<b>Between 5-24%</b>	<b>FLORIDA</b>			
	Glades	3,000	2,900	97
	Palm Beach No	247,400	245,100	99
<b>Station Totals</b>		<b>1,706,200</b>	<b>1,692,900</b>	<b>99</b>
<b>Net Weekly Circulation (1993)</b>				<b>1,692,900</b>
<b>Average Daily Circulation (1993)</b>				<b>558,000</b>

Call Warren Publishing Inc.'s  
Market Research & Data Sales Dept.  
202-872-9200



# Florida—Miami

**WPLG**

Ch. 10

**Network Service:** ABC.

**Licensee:** Post-Newsweek Stations of Florida Inc., Broadcast House, 3900 Biscayne Blvd., Miami, FL 33137.

**Studio:** 3900 Biscayne Blvd., Miami, FL 33137.

**Telephone:** 305-576-1010. **TWX:** 810-848-6032. **Fax:** 305-325-2381.

**Technical Facilities:** Channel No. 10 (192-198 MHz). Authorized power: 316-kw visual, 47.9-kw aural. Antenna: 1003-ft. above av. terrain, 1045-ft. above ground, 1049-ft. above sea level.

Latitude	25°	57'	59"
Longitude	80°	12'	44"

**Transmitter:** Approx. 0.375-mi. W of State Rte. 7, Miami antenna farm, near Hallandale.

**Multichannel TV Sound:** Stereo only.

**Satellite Earth Stations:** Transmit/receive AFC, 4.5-meter C-band; Scientific-Atlanta, 10-meter C-band; AFC, 7-meter C-band; SatCom, 7-meter C-band; SatCom, 7-meter Ku-band; Microdyne, Scientific-Atlanta receivers.

**SNG Mobile Dish:** Andrew, 3.7-meter Ku-band.

**News Services:** AP, UPI.

**Ownership:** Post-Newsweek Stations Inc. (Group Owner)

**Began Operation:** November 20, 1961. Sale to present owner by C. H. Topmiller, Thomas A. Welstead, et al., approved by FCC Sept. 24, 1969 (Television Digest, Vol. 9:39).

**Represented (sales):** TeleRep Inc.

**Represented (legal):** Covington & Burling.

**Represented (engineering):** Jules Cohen & Associates, P.C.

## Personnel:

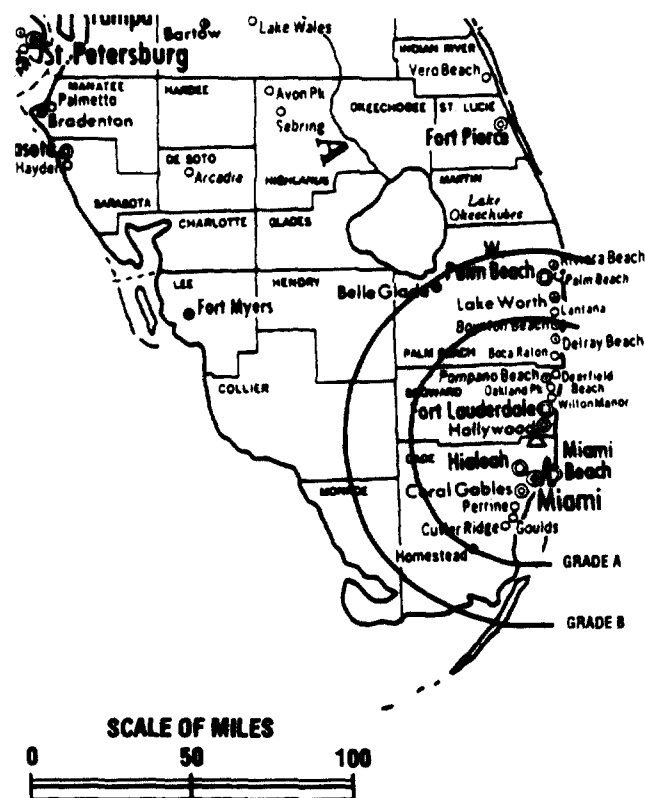
**John Garwood**, Vice President & General Manager.  
**Keith Kelly**, Vice President, Administration.  
**Ron Collins**, General Sales Manager.  
**Judy Obernier**, Local Sales Manager.  
**Steve Flanagan**, Vice President, Engineering.  
**Thomas Doerr**, News Director.  
**Oscar Welch**, Program & Promotion Director.  
**Linda Lucas**, Marketing Director.

**Rates:** On request.

**NETWORK BASE HOURLY RATE:** \$2625.

**City of License:** Miami. **ADI:** Miami-Fort Lauderdale. **Rank:** 15.

Total Households: ©MSI Consumer Market Data as of 1/1/93. TV Homes, TV% and Circulation ©1993 Arbitron. County coverage based on Arbitron study.



WPLG BPCT-861230KJ Granted 2/27/87 © American Map Corp., No. 14244

Net Weekly Circulation	State County	Total Households	TV Households	%
50% & Over	FLORIDA			
	Broward	553,600	550,900	100
	Dade	713,800	708,900	99
	Monroe	35,100	34,400	98
	Palm Beach So	152,300	150,700	99
Between 25-49%	FLORIDA			
	Martin	46,300	45,800	99
Between 5-24%	FLORIDA			
	Hendry	8,900	8,700	98
	Palm Beach No	247,400	245,100	99
	St Lucie	63,100	62,400	99
<b>Station Totals</b>		<b>1,820,500</b>	<b>1,806,900</b>	<b>99</b>
<b>Net Weekly Circulation (1993)</b>				<b>1,214,200</b>
<b>Average Daily Circulation (1993)</b>				<b>695,600</b>

### Florida—Miami

## Ch. 6

**Network Service:** CBS.

Licensee: CBS Inc., 51 W. 52nd St., New York, NY 10019.

Studio: 8900 N.W. 18th Terrace, Miami, FL 33172

**Telephones:** 305-593-0606; 305-522-6060. **Fax:** 305-591-3706.

**Technical Facilities:** Channel No. 6 (82-88 MHz). Authorized power: 100-kw visual, 20-kw aural. Antenna: Circularly polarized, 1802-ft. above av. terrain, 1842-ft. above ground, 1849-ft. above sea level.

Latitude	25°	32'	24"
----------	-----	-----	-----

Longitude	80°	28'	07"
-----------	-----	-----	-----

Transmitter: 17107 S.W. 248th St., Princeton, FL

**Multichannel TV Sound:** Stereo and separate audio program.

**Satellite Earth Stations:** Scientific-Atlanta, 10-meter C-band; Harris, 9-meter C-band. Andrew C-band; Harris, Andrew receivers.

**Ownership:** CBS Inc. (Group Owner).

**Began Operation:** September 20, 1967. Transfer of control to General Cinema Corp. approved by FCC Aug. 10, 1972 (*Television Digest*, Vol. 12:33). Assignment of license to Taft Bcstg. by General Cinema Corp. approved by FCC Feb. 24, 1983. FCC approved sale to TVX Broadcast Group Feb. 20, 1987 (Vol. 27:9, 14, 15). CBS assumed control of station Jan. 4, 1989 (Vol. 28:45).

**Represented (sales):** CBS Television Stations National Sales.

**Personnel:**

**Allen Shelden, Vice President & General Manager.**

**Joe Callin**, Director of Sales.

**Cara Cagliano, General Sales Manager.**

**Stuart Pruzansky, Local Sales Manager.**

**Sue Kawalerski, News Director.**

**Jerry Birdwell, Program Director.**

**Charles Kohlmann, Promotion Manager.**

**Patrick Schultz**, Business Manager.

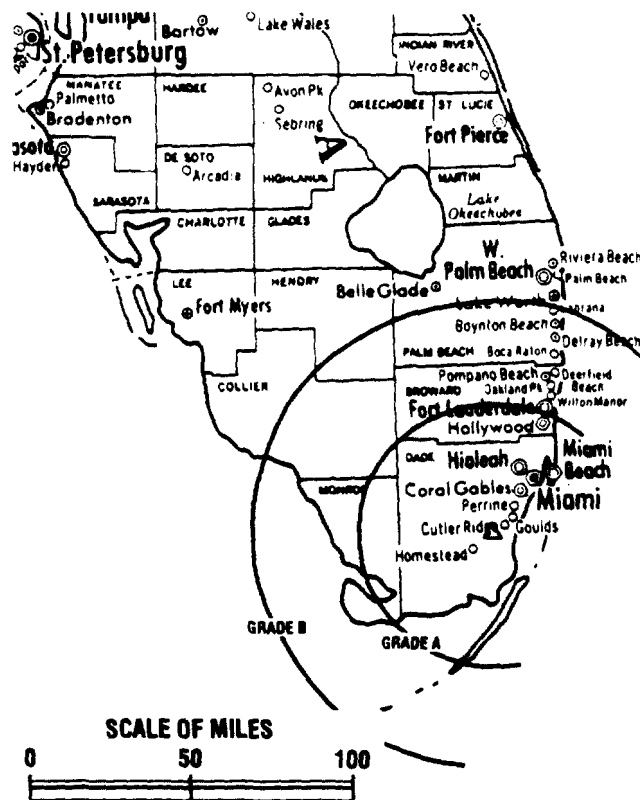
**Brian Blum, Director of Communications.**

**Barrie Wimmers, Chief Engineer.**

**Rates:** On request.

City of License: Miami. ADI: Miami-Fort Lauderdale. Rank: 15.

Total Households: ©MSI Consumer Market Data as of 1/1/93 TV Homes, TV% and Circulation ©1993 Arbitron  
County coverage based on Arbitron study.



WCIX BMPCT-870108KF Granted 1/30/87 © American Map Corp., No. 14244

Net Weekly Circulation	State County	Total Households	TV Households	%
<b>50% &amp; Over</b>	<b>FLORIDA</b>			
	Broward	553,600	550,900	100
	Dade	713,800	708,900	99
	Monroe	35,100	34,400	98
<b>Between 5-24%</b>	<b>FLORIDA</b>			
	Palm Beach So	152,300	150,700	99
<b>Station Totals</b>		<b>1,454,800</b>	<b>1,444,900</b>	<b>99</b>
<b>Net Weekly Circulation (1993)</b>				<b>901,200</b>
<b>Average Daily Circulation (1993)</b>				<b>425,200</b>

## Florida—Miami

### WBFS-TV

Ch. 33

**Network Service:** None, independent.

**Licensee:** Channel 33 Inc., Box 4633, Miami, FL 33014

**Studio:** 16550 N.W. 52nd Ave., Miami, FL 33014.

**Mailing Address:** Box 4633, Miami, FL 33014.

**Telephone:** 305-621-3333. **Fax:** 305-621-3844.

**Technical Facilities:** Channel No. 33 (584-590 MHz). Authorized power: 5000-kw max. visual, 500-kw max. aural. Antenna: 924-ft. above av. terrain, 927-ft. above ground, 931-ft. above sea level.

Latitude	25°	57'	59"
Longitude	80°	12'	33"

**Transmitter:** 390 N.W. 210th St., Miami.

**Satellite Earth Stations:** Harris, 9-meter C-band; Harris, 6.1-meter C-band; Harris receivers.

**Ownership:** Combined Broadcasting Inc. (Group Owner).

**Began Operation:** December 9, 1984. Transfer of control to present owners approved by FCC June 8, 1988.

**Represented (sales):** Katz Independent Television.

**Represented (legal):** Fisher, Wayland, Cooper & Leader.

**Represented (engineering):** Lohnes & Culver.

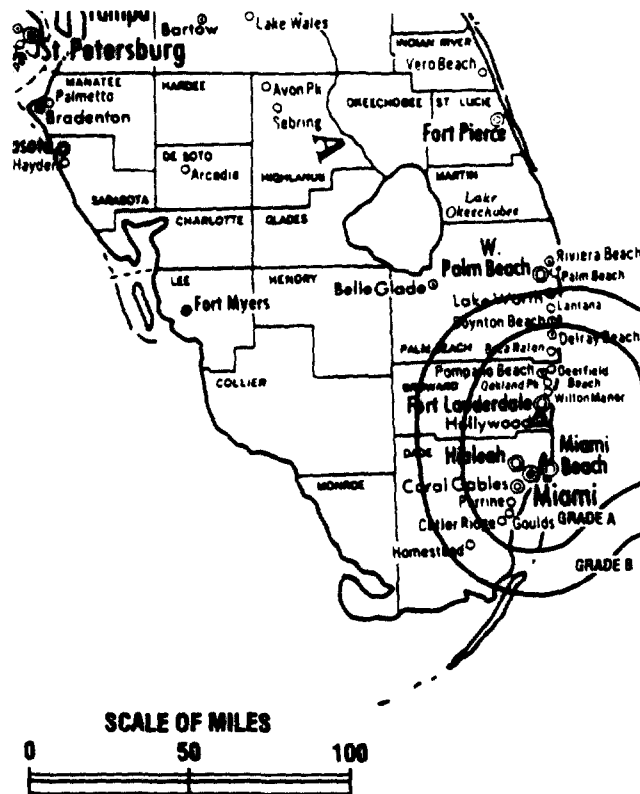
#### Personnel:

**Jerry Carr**, Vice President & General Manager.  
**El Muth**, General Sales Manager.  
**Wendy Kamilar**, Local Sales Manager.  
**Jim Navarro**, National Sales Manager.  
**Stan Wasilik**, Program Director.  
**Lee Rowand**, Promotion Director.  
**Paula Aberle**, Business Manager.  
**Jim Cottrill**, Chief Engineer.

**Rates:** On request.

**City of License:** Miami. **ADI:** Miami-Fort Lauderdale. **Rank:** 15.

Total Households: ©MSI Consumer Market Data as of 1/1/93. TV Homes, TV% and Circulation ©1993 Arbitron. County coverage based on Arbitron study.



WBFS-TV BMPCT-840322KG Granted 10/31/84 © American Map Corp., No. 14244

Net Weekly Circulation	State County	Total Households	TV Households	%
Between 25-49%	FLORIDA			
	Broward	553,600	550,900	100
	Dade	713,800	708,900	99
Between 5-24%	FLORIDA			
	Palm Beach No	247,400	245,100	99
	Palm Beach So	152,300	150,700	99
<b>Station Totals</b>		<b>1,567,100</b>	<b>1,555,600</b>	<b>99</b>
<b>Net Weekly Circulation (1993)</b>				<b>613,600</b>
<b>Average Daily Circulation (1993)</b>				<b>238,900</b>

# Florida—Miami-Fort Lauderdale

**WDZL**

**Ch. 39**

**Network Service:** None, independent.

**Licensee:** Channel 39 Licensee Inc., 2055 Lee St., Hollywood, FL 33020.

**Studio:** 2055 Lee St., Hollywood, FL 33020.

**Telephones:** 305-925-3939; 305-949-3900. Fax: 305-922-3965.

**Technical Facilities:** Channel No. 39 (620-626 MHz). Authorized power: 3980-kw max. visual, 400-kw max. aural. Antenna: 700-ft. above av. terrain, 703-ft. above ground, 713-ft. above sea level.

Latitude 25° 58' 48"  
Longitude 80° 11' 47"

**Transmitter:** 3200 S.W. 52nd Ave., Miami Gardens.

**Satellite Earth Stations:** Scientific-Atlanta, 7-meter C-band; Vertex, 6-meter Ku-band; Scientific-Atlanta, Standard Communications, Agile Omni receivers.

**Ownership:** Renaissance Communications Corp. (Group Owner).

**Began Operation:** October 16, 1982. Sale to Odyssey Partners approved by FCC April 4, 1984 (Television Digest, Vol. 24:2). Sale to present owners approved by FCC March 23, 1989.

**Represented (sales):** MMT Sales Inc.

**Represented (legal):** Reed, Smith, Shaw & McClay.

**Represented (engineering):** Jules Cohen & Associates, P.C.

## Personnel:

Harvey E. Cohen, President & General Manager.

Marilyn Hansen, General Sales Manager.

Dennis Arnold, Local Sales Manager.

Matthew Bazar, Regional Sales Manager.

Alan Rosenfeld, National Sales Manager.

Robert M. Castillo, Chief Engineer.

Bob Ramsey, Program & Promotion Manager.

Mark Ryan, Business Manager.

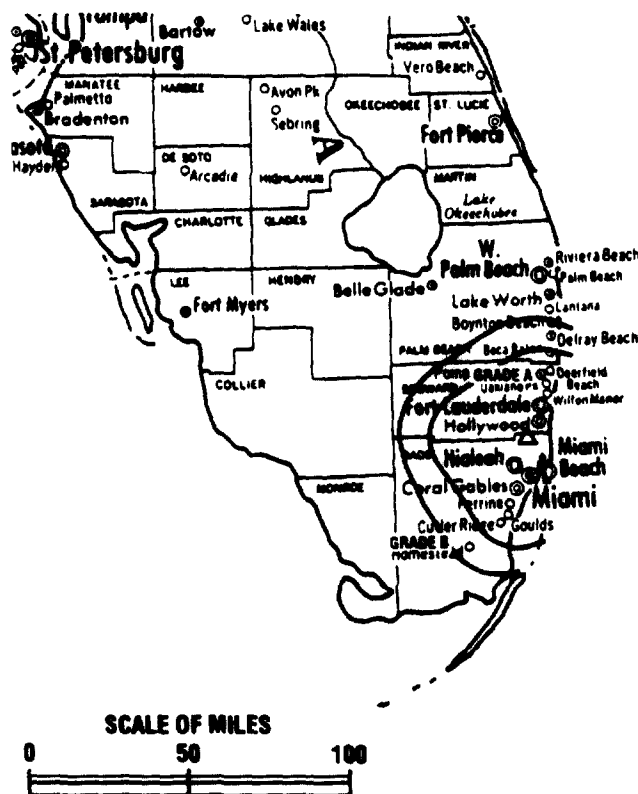
Jeff Eggleston, Operations Manager.

Jeanette Jordan, Community & Public Affairs Director.

**Rates:** On request.

**City of License:** Miami. ADI: Miami-Fort Lauderdale. Rank: 15.

Total Households: ©MSI Consumer Market Data as of 1/1/93. TV Homes, TV% and Circulation ©1993 Arbitron. County coverage based on Arbitron study.



WDZL BPCT-840709KH Granted 7/31/84

© American Map Corp., No. 14244

Net Weekly Circulation	State County	Total Households	TV Households	%
Between 25-49%	FLORIDA			
	Broward	553,600	550,900	100
	Dade	713,800	708,900	99
Between 5-24%	FLORIDA			
	Palm Beach So	152,300	150,700	99
<b>Station Totals</b>		<b>1,419,700</b>	<b>1,410,500</b>	<b>99</b>
<b>Net Weekly Circulation (1993)</b>				<b>583,300</b>
<b>Average Daily Circulation (1993)</b>				<b>226,400</b>